

EXHIBIT 1

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DONALD AGEE, JR. et al.,

Plaintiffs,

v.

JOCELYN BENSON, et al.,

Defendants.

Case No. 1:22-CV-00272-RMK-JTN-PLM

DECLARATION OF ANTHONY EID

I, Anthony Eid, declare and state pursuant to 28 U.S.C. § 1746 as follows:

1. I am a Commissioner on the Michigan Independent Citizens Redistricting Commission.

2. I serve as a Commissioner unaffiliated with any major political party.

3. I have resided in Metro Detroit for 10+ years.

4. This declaration is given based on my personal knowledge concerning facts with which I am intimately familiar. I reviewed Exhibit A (the “MICRC State House Hickory Plan - with City of Detroit Neighborhoods”), a map showing the Detroit neighborhood boundaries overlaid on top of the enacted House plan, Exhibit B (the “Trende State House Plan - with City of Detroit Neighborhoods”), a map showing the Detroit neighborhood boundaries overlaid on top of the enacted House plan, Exhibit C (the “Linden State Senate Plan - with City of Detroit Neighborhoods”), a map showing the Detroit neighborhood boundaries overlaid on top of the enacted Senate plan, Exhibit D (the “Trende State Senate #1 Plan - with City of Detroit Neighborhoods”), a map showing the Detroit neighborhood boundaries overlaid on top

of Plaintiffs' expert Sean Trende's first Senate demonstrative map, and Exhibit E (the "Trende State Senate #2 - with City of Detroit Neighborhoods"), a map showing the Detroit neighborhood boundaries overlaid on top of Plaintiffs' expert Sean Trende's second Senate demonstrative map, as part of preparing this declaration. I also reviewed Exhibit F ("Excerpts of Hickory House Districts"), maps showing select districts in the enacted House plan, and Exhibit G ("Excerpts of Linden Senate Districts"), maps showing select districts in the enacted Senate plan, which are publicly available on the Commission's website: <https://www.michigan.gov/micrc/mapping-process/final-maps>, as well as Exhibit H ("Excerpts from Trende Report – Appendix C (Demonstration Plan Details)").

Role in Map-Drawing Process

5. I, along with the other commissioners, prepared the drafts and final version of the enacted plans—the Hickory and Linden maps—using several sources of data and information relating to communities of interest across Michigan, including data provided to the Commission by Election Data Services showing the neighborhood boundaries of 200+ neighborhoods in and around the city of Detroit, communities of interest that many members of the public asked the Commission to preserve. These boundaries appeared as an overlay and could be turned on and off as maps were drawn in the Detroit area.

6. In addition, the Commission considered the knowledge and input of Commissioners who resided in Detroit and were familiar with Detroit's many communities of interest, as well as the thousands of public comments and testimony made throughout the redistricting process.

7. I supported and voted for both the Hickory and Linden maps through the collaborative map-drawing process. The Commission drafted multiple versions of both the house and senate maps. The people of Michigan had the opportunity to, and did, give feedback on the

Hickory and Linden maps. Commissioners collaboratively edited the plans after the Commission's public hearings. I was present during Commission meetings when map-drawing decisions were made related to the Hickory and Linden maps. I supported the Hickory and Linden maps because the public response to the maps indicated that the public preferred these maps over others, and I believed they would be supported by the necessary votes among the Commissioners. Among other things, I believed the Hickory and Linden maps honored communities of interest including Detroit neighborhoods while also adhering to the other constitutional map-drawing criteria. This Declaration sets forth my understanding of some of the goals and considerations that went into the drawing of the Hickory and Linden maps and the communities of interests and neighborhoods preserved therein as compared to Plaintiffs' expert Sean Trende's demonstrative maps.

House District 1

8. Hickory District 1 of Exhibit A maintains the neighborhoods of Boynton, Oakwood Heights, Carbon Works, Delray, Springwells, Michigan Martin, Central Southwest, Hubbard Farms, West Side Industrial, Mexicantown, Hubbard Richard, Corktown, North Corktown, Claytown, Chadsey Condon, Core City, NW Goldberg, LaSalle Gardens, Wildemere Park, Jamison, and Petoskey-Otsego.

9. Hickory District 1 preserves the core area of downtown Detroit, east of Woodward and going down the Detroit River to keep neighborhoods in Detroit intact as much as possible.

10. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Springwells, Central Southwest, and West Side Industrial between Trende Districts 5 and 11 and splits Claytown and Midwest between Trende Districts 5 and 6.

11. Trende's District 5 of Exhibit B stretches east and west of Woodward Avenue, merging areas of downtown and midtown Detroit with the neighborhoods of Airport Sub, LaSalle, and Gratiot, communities that do not have much in common with the core areas of Detroit.

House District 3

12. Hickory District 3 of Exhibit A maintains the neighborhoods of Far West Detroit, Warrendale, Garden View, and Warren Ave.

13. Hickory District 3 preserves the Arab-American community in and around Dearborn and Detroit, which I understand to be a cohesive community of interest.

14. Additionally, Hickory District 3 includes the city of Melvindale with Dearborn, a request made by members of the public through public comment. In reviewing Exhibit B, I notice that this map separates Melvindale and Dearborn into Trende Districts 11 and 15.

House District 4

15. Hickory District 4 of Exhibit A maintains the neighborhoods of Grand River-St Marys, Grandmont, Greenfield-Grand River, Southfield Plymouth, Plymouth-196, Plymouth-Hubbell, We Care, Barton-McFarland, Fiskhorn, Joy-Schaefer, and Aviation Sub.

16. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Schoolcraft Southfield, Barton-Mcfarland, and Aviation Sub.

House District 5

17. Hickory District 5 of Exhibit A maintains the neighborhoods of Greenfield, San Bernardo, Seven Mile Lodge, Schaefer 7/8 Lodge, College Park, Crary/St Marys, Hubbell-Puritan, Belmont, Hubbell-Lyndon, and Cadillac.

18. Hickory District 5 preserves the community of interest between Greenfield, San Bernardo, Seven Mile Lodge, and Schaefer 7/8 Lodge. The drawing of District 18 affected District 5, because District 18 preserves a community of interest between Southfield and Lathrup Village in response to public comment.

19. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Greenfield, San Bernardo, and Schaefer 7/8 Lodge between Trende Districts 8 and 10.

House District 6

20. Hickory District 6 of Exhibit A maintains the neighborhoods of Blackstone Park, Pembroke, Greenwich, McDowell, Oak Grove District 2, Schulze, Bagley, Harmony Village, and Happy Homes.

21. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Greenwich and McDowell between Trende Districts 8 and 10 and splits Bagley between Trende Districts 6 and 8.

House District 7

22. Hickory District 7 of Exhibit A maintains the neighborhoods of Garden Homes, Green Acres, Sherwood Forest, Palmer Woods, University District, Detroit Golf, Palmer Park, Martin Park, Pilgrim Village, Chalfonte, Dexter-Fenkell, Northwest, Davison-Schoolcraft, Paveway, Littlefield, and Russell Woods.

23. Hickory District 7 preserves the large LGBTQ+ community of interest between Royal Oak, Ferndale, Palmer Park, and Palmer Woods.

24. In reviewing Exhibit B, I notice that this map splits the neighborhood of Garden Homes between Trende Districts 8 and 10. I also notice that Exhibit B splits the LGBTQ+ community of interest, putting Palmer Park in Trende District 4 and Palmer Woods in Trende District 8.

House District 8

25. Hickory District 8 of Exhibit A maintains the neighborhoods of State Fair, Nolan, Penrose, Grixdale Farms, Greenfield Park, Hawthorne Park, Northeast Central, Cadillac Heights, Gateway, Boston Edison, Arden Park, Piety Hill, North End, Virginia Park, New Center Commons, New Center, Tech Town, Medbury Park, Wayne State, and Cultural Center.

26. Hickory District 8 preserves the core areas of midtown Detroit, the educational hub of the city, keeping together the community of interest between Wayne State, Tech Town, New Center, and New Center Commons.

27. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Nolan, Hawthorne Park, and Cadillac Heights between Trende Districts 3 and 4 and splits Midtown between Trende Districts 4 and 5.

House District 9

28. Hickory District 9 of Exhibit A maintains the neighborhoods of North Campau, Campau/Banglatown, Buffalo Charles, Airport Sub, Russell Industrial, Poletown East, Gratiot Town/Kettering, Pingree Park, Gratiot Woods, West End, East Canfield, Ravendale, Chandler Park, Chandler Park-Chalmers, Fox Creek, Forest Park, Jeffries, Brush Park, Brewster Homes, Douglass, and Eastern Market.

29. Hickory District 9 preserves the majority of Midtown, Medical Center, and all of Eastern Market within the district, key communities of interest that share similar characteristics as core downtown Detroit communities. I notice that Exhibit B separates the community of interest between Eastern Market, Medical Center, and Midtown between Trende Districts 4 and 5.

30. Hickory District 9 also maintains Airport Sub and West End together, a community of interest that submitted public comment asking to remain together. I notice that Exhibit B splits this community of interest by placing Airport Sub in Trende District 4 and West End in Trende District 5, in addition to splitting the individual neighborhood of Airport Sub between Trende Districts 4 and 5, and splitting West End between Trende Districts 2 and 4.

31. Members of the Bengali community submitted public comment to the Commission outlining the community's neighborhood boundaries and asking that these neighborhoods be

maintained together. Hickory District 9 preserves the Bengali community around Hamtramck and North Campau, Campau/Banglatown, Buffalo Charles, and Airport Sub.

32. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Buffalo Charles between Trende Districts 3 and 4, splits Airport Sub between Trende Districts 4 and 5, and separates Airport Sub from Hamtramck, North Campau, Campau/Banglatown, and Buffalo Charles in Trende District 3, fracturing the Bengali community into separate districts.

33. I also notice that Exhibit B splits the neighborhoods of Gratiot Town/Kettering and McDougall-Hunt between Trende Districts 4 and 5, splits East Canfield between Trende Districts 2 and 5, and splits Ravendale and Wade between Trende Districts 2 and 4.

House District 10

34. Hickory District 10 of Exhibit A maintains the neighborhoods of Greektown, Lafayette Park, Elmwood Park, Rivertown, Islandview, West Village, Indian Village, East Village, Gold Coast, Joseph Berry Sub, Waterworks Park, Marina District, Riverbend, and Jefferson Chalmers.

35. Hickory District 10 in Exhibit F maintains the lakeshore community of interest along the Detroit River. Additionally, the Commission received public comment from the Gross Pointe communities, asking that Gross Pointe Woods, Gross Pointe Park, Gross Pointe Farms, and Gross Pointe Shores be kept together.

36. In reviewing Exhibit B, I notice that this map splits the neighborhoods of East Village and Conner Creek Industrial between Trende Districts 2 and 5 and splits the lakeshore community of interest between Trende Districts 2 and 5 as shown by Exhibit H. I also notice that the Trende map splits the Gross Pointe community of interest, placing Gross Pointe Woods with Harper Woods, which was a configuration that was not requested from the public.

House District 11

37. Hickory District 11 of Exhibit A maintains the neighborhoods of Moross-Morang, Denby, Yorkshire Woods, and Cornerstone Village.

38. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Moross-Morang, Denby, and Yorkshire Woods between Trende Districts 1 and 2.

House District 12

39. Hickory District 12 of Exhibit A maintains the neighborhoods of Regent Park and Mapleridge.

40. Hickory District 12 combines Eastpointe with the neighborhoods of Regent Park and Mapleridge. The Commission received public comment in favor of combining Eastpointe with portions of Detroit, as residents of Eastpointe share many common experiences with residents of Detroit. Hickory District 12, as shown in Exhibit F, also places Eastpointe and Roseville in the same district based on public comment.

41. In reviewing Exhibit B, I notice that this map splits the neighborhood of Mapleridge between Trende Districts 1 and 4.

House District 13

42. Hickory District 13 of Exhibit A maintains the neighborhoods of Mohican Regent, Pulaski, Franklin, Von Steuben, LaSalle College Park, and Gratiot-Findlay.

43. The drawing of Hickory Districts 57 and 58, which maintain the Chaldean community of interest around Troy and Sterling Heights as shown in Exhibit F, a community of interest that identified separately from other Arab-Americans in and around Detroit, affected the drawing of Hickory District 13.

44. In reviewing Exhibit B, I notice that this map splits the neighborhood of Eden Gardens between Trende Districts 2 and 4.

House District 14

45. Hickory District 14 of Exhibit A maintains the neighborhoods of Butler, Pershing, Farwell, Sherwood, Nortown, Conant Gardens, Krainz Woods, Grant, Mount Olivet, and Davison.

46. In reviewing Exhibit B, I notice that this map places northern Detroit neighborhoods with the Bengali community around Hamtramack, North Campau, Campau/Banglatown, and Buffalo Charles. These communities do not share much in common.

House District 16

47. Hickory District 16 of Exhibit A maintains the neighborhoods of Evergreen-Outer Drive, Miller Grove, McNichols Evergreen, North Rosedale Park, Minock Park, Rosedale Park, Westwood Park, Grandmont #1, Eliza Howell, Castle Rouge, and West Outer Drive.

48. Hickory District 15 preserves the city of Dearborn Heights, which impacted the drawing of Hickory Districts 3 and 16. The Commission received public comment asking that Dearborn Heights be maintained whole.

49. In reviewing Exhibit H, I notice that this map places Dearborn Heights with Inkster, communities which are separate and distinct from one another and do not share many common characteristics.

House District 17

50. Hickory District 17 of Exhibit A maintains the neighborhoods of Five Points, Seven Mile-Rouge, Berg-Lahser, Evergreen Lahser 7/8, O'Hair Park, The Eye, Oak Grove District 1, Melvern Hill, Old Redford, South of Six, and Riverdale.

51. In reviewing Exhibit B, I notice that this map splits the neighborhoods of Evergreen Lahser 7/8 and Holcomb between Trende Districts 7 and 8.

Senate District 1

52. Linden District 1 of Exhibit C maintains the neighborhoods of Northwest, Davison-Schoolcraft, Dexter-Fenkell, Paveway, Pride Area, Littlefield, Oakman Blvd, Russell Woods, Dexter-Linwood, Nardin Park, Barton-McFarland, Petoskey-Ostego, Jamison, Virginia Park, Wildemere Park, LaSalle Gardens, NW Goldberg, Elijah McCoy, Chadsey Condon, Core City, Michigan-Martin, Central Southwest, Hubbard Farms, Mexicantown, North Corktown, Corktown, Hubbard Richard, West Side Industrial, Delray, Carbon Works, Oakwood Heights, and Boynton.

53. Linden District 1 preserves the Downriver community of interest, a community of interest separate and distinct from the educational hub of Detroit around Wayne State, Tech Town, New Center, and New Center Commons. The Linden plan also provides Downtown Detroit with greater representation in the Senate by drawing two Downtown districts with Linden District 1 and District 3.

54. In contrast, Trende Exhibit D and Exhibit E combine Downriver communities, which are more industrial in nature and run along major highways such as I-75 and I-94, with the educational hub around Wayne State, Tech Town, New Center, and New Center Commons, and core downtown Detroit areas into just one district in Trende District 2, providing Downtown Detroit with just one senator.

55. In reviewing Exhibit D and Exhibit E, I notice that these maps split the neighborhoods of Dexter-Linwood between Trende Districts 2 and 3 and split Midwest between Trende Districts 2 and 4, and Exhibit D splits Nardin Park between Trende Districts 2 and 3.

Senate District 2

56. Linden District 2 of Exhibit C maintains the neighborhoods of West Outer Drive, Rouge Park, Far West Detroit, Weatherby, Southfield Plymouth, Plymouth-196, Franklin Park, Joy, We Care, Warrendale, Garden View, Warren Ave, Fiskhorn, Joy-Schaefer, and Aviation Sub.

57. Linden District 2 maintains Dearborn and Dearborn Heights together, which are made up of Arab-American communities that identify together.

58. In reviewing Exhibit H, I notice that this map places Dearborn Heights with Inkster in Trende District 4, communities which are separate and distinct from one another and do not share many common characteristics. As a result, Exhibit H separate Dearborn Heights from Dearborn and divide the Arab-American community of interest.

Senate District 3

59. Linden District 3 of Exhibit C maintains the neighborhoods of Nolan, Butler, Pershing, Greenfield Park, Hawthorne Park, Northeast Central, Conant Gardens, Cadillac Heights, Davison, North Campau, Campau/Banglatown, Buffalo Charles, Gateway, Arden Park, Piety Hill, Virginia Park, New Center Commons, New Center, North End, Russell Industrial, Airport Sub, Milwaukee Junction, Poletown East, Medbury Park, Tech Town, Wayne State, Cultural Center, Gratiot Town/Kettering, Jeffries, Midtown, Medical Center, Forest Park, McDougall-Hunt, Gratiot-Grand, Pingree Park, Gratiot Woods, West End, East Canfield, Brush Park, Brewster Homes, Douglass, Eastern Market, Greektown, Lafayette Park, Elmwood Park, Islandview, West Village, Indian Village, East Village, Conner Creek Industrial, Rivertown, Gold Coast, Joseph Berry Sub, Waterworks Park, Marina District, and Jefferson Chalmers.

60. In response to public comment, Linden District 3 preserves the Bengali community around Hamtramck and North Campau, Campau/Banglatown, Buffalo Charles, and Airport Sub.

61. In reviewing Exhibit D, I notice that this map splits the neighborhoods of Davison, and splits Campau/Banglatown between Trende Districts 1 and 3 and Airport Sub between Trende Districts 1 and 2. Exhibit D also fractures the Bengali community into separate districts by placing Hamtramck and portions of Airport Sub in Trende District 2, North Campau and

Campau/Banglatown in Trende District 3, and Buffalo Charles and portions of Airport Sub in Trende District 1.

62. In reviewing Exhibit E, I notice that this map splits the neighborhood of Davison between Trende Districts 2 and 3. Exhibit E also fractures the Bengali community into separate districts by placing North Campau and Campau/Banglatown in Trende District 3 and Hamtramck, Buffalo Charles, and Airport Sub in Trende District 3.

Senate District 6

63. Linden District 6 of Exhibit C maintains the neighborhoods of Five Points, Seven Mile-Rouge, Melvern Hill, Old Redford, Holcomb, Evergreen-Outer Drive, College Park, The Eye, Oak Grove District 1, South of Six, Riverdale, Miller Grove, McNichols Evergreen, North Rosedale Park, Crary/St Marys, Eliza Howell, Castle Rouge, Minock Park, Rosedale Park, Westwood Park, Grandmont #1, Grand River-St Marys, Grandmont, Greenfield-Grand River.

64. The drawing of Linden District 2, which maintains the Arab-American community of interest in Dearborn and Dearborn Heights, affected the drawing of Linden District 6.

65. In reviewing Exhibit D and Exhibit E, I notice that these maps split the neighborhoods of Grandmont and Greenfield-Grand River between Trende Districts 4 and 5. Members of the public asked that Grandmont and Greenfield-Grand River remain together as a community of interest.

Senate District 7

66. Linden District 7 of Exhibit C maintains the neighborhoods of Berg-Lahser, Evergreen 7/8, O'Hair Park, Greenfield, San Bernardo, and Seven Mile Lodge.

67. In reviewing Exhibit D and Exhibit E, I notice that these maps split the neighborhoods of San Bernardo and Schaefer 7/8 Lodge between Trende Districts 3 and 5.

Senate District 8

68. Linden Senate District 8 of Exhibit C maintains the neighborhoods of Blackstone Park, Pembroke, Garden Homes, Green Acres, State Fair, Greenwich, McDowell, Oak Grove District 2, Sherwood Forest, Palmer Woods, Penrose, Winship, Tri-Point, Schulze, Bagley, University District, Detroit Golf, Palmer Park, Grixdale Farms, Hubbell-Puritan, Harmony Village, Fitzgerald/Marygrove, Martin Park, Belmont, Bethune, Chalfonte, Hubbell-Lyndon, Cadillac, and Happy Homes.

69. Linden District 8 preserves the large LGBTQ+ community of interest between Royal Oak, Ferndale, Palmer Park, and Palmer Woods.

70. In reviewing Exhibit D and Exhibit E, I notice that these maps split the neighborhoods of Winship and Bethune between Trende Districts 3 and 5 and split Hubbell-Lyndon between Trende Districts 4 and 5.

Senate District 10

71. Linden District 10 of Exhibit C maintains the neighborhoods of Sherwood, Nortown, Conner Creek, Pulaski, Krainz Woods, Grant, Mount Olivet, Von Steuben, Franklin, LaSalle College Park, Gratiot-Findlay, Eden Gardens, Mapleridge, Wade, Ravendale, Outer Drive-Hayes, Denby, Moross-Morang, Yorkshire Woods, Chandler Park, Chandler Park-Chalmers, Morningside, East English Village, Cornerstone Village, Fox Creek, and Riverbend.

72. The drawing of Linden District 12, which maintains the lakeshore community of interest and the community of interest in Gross Pointe as shown in Exhibit G, affected the drawing of Linden District 10 and Linden District 11. Linden District 10 and Linden District 11 preserve inland, industrial communities of interest.

73. In reviewing Exhibit D and Exhibit E, I notice that these maps split the neighborhoods of Grant between Trende District 1 and 3 and split Morningside and Wade between

Trende Districts 1 and 2. Exhibit E also splits Chandler Park-Chalmers between Trende Districts 1 and 2.

Senate District 11

74. Linden District 11 of Exhibit C maintains the neighborhoods of Mohican Regent and Regent Park. As shown in Exhibit G, Linden District 7 also places Eastpointe and Roseville in the same district based on public comment.

* * * *

75. In general, I notice that many of the House districts in Exhibit B do not cross the county boundaries between Wayne and Oakland, or Wayne and Macomb counties. I would suspect that this choice would result in an overall district plan that would not meet the constitutional requirements of the commission to create district plans that do not create a disproportionate advantage to either political party, a requirement that was the 4th ranked criteria in the rank list the Commission was bound to follow. It is my understanding that one of the goals in drawing districts that extend outside of Wayne County, including but not limited to House District 8, House District 11, House District 12, House District 13, House District 14, Senate District 3, Senate District 7, Senate District 8, Senate District 10, and Senate District 11, were to create districts that complied with the constitutional criteria for partisan fairness. The Commission received information from our experts that the Democratic vote in Detroit was highly concentrated. We used this information to create more balanced districts that accounted for heavily Republican areas in other areas of the State due to Michigan's unique geographical layout.

76. The Commission had Voting Rights Act-compliance goals based on a thorough expert report of Dr. Handley. I reviewed Dr. Handley's work and found no flaws in it, and I was not informed of any flaws in her report by others. While VRA compliance was an important goal of the Commission, it was not the only goal, and configuring districts based on criteria like those

I have described at length above was as important in my mind as VRA compliance. Criteria like compactness, communities of interest, partisan-fairness, and other things had a direct and significant impact on district lines, and VRA-compliance goals were only part of that larger matrix of highly important factors.

77. I never saw a plan that achieved the communities-of-interest or partisan fairness goals of the Hickory and Linden plans, and that includes the plans proposed by Mr. Trende.

78. Plaintiffs' demonstrative plans do not convince me that the Commission could have achieved all the communities-of-interest and partisan fairness goals while complying with the ranked constitutional criteria.

79. Plaintiffs' demonstrative district configurations do not appear to try to achieve the Commission's goals concerning communities of interest or partisan fairness.

80. I would not have supported Plaintiffs' demonstrative maps of the Detroit-area districts.

I declare under penalty of perjury that to the best of my memory the foregoing is true and correct.

Dated this 6th day of June, 2023.

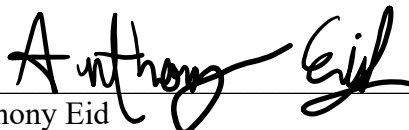
By: 
Anthony Eid

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Michigan - MICRC State House Hickory Plan - with City of Detroit Neighborhoods

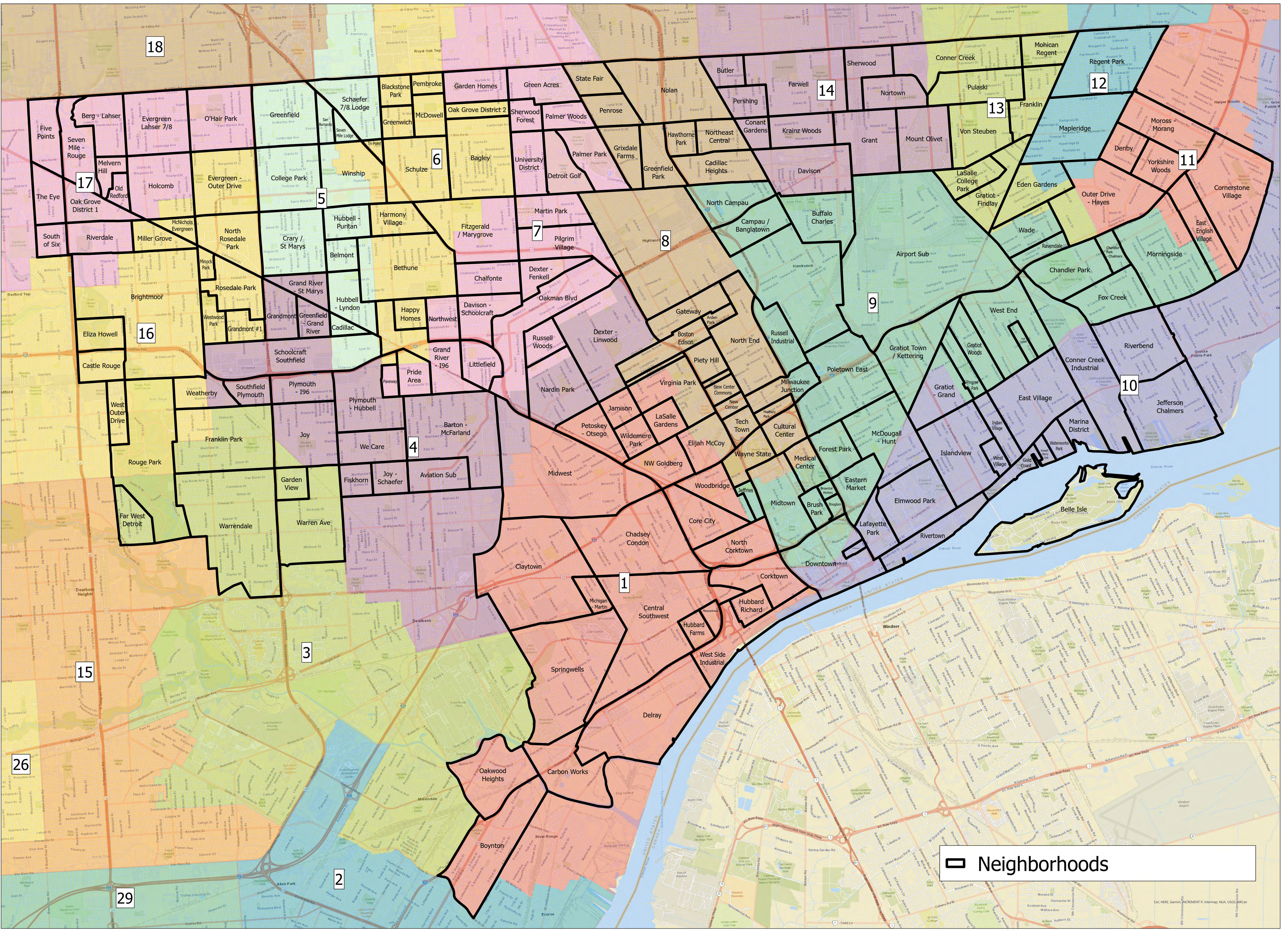
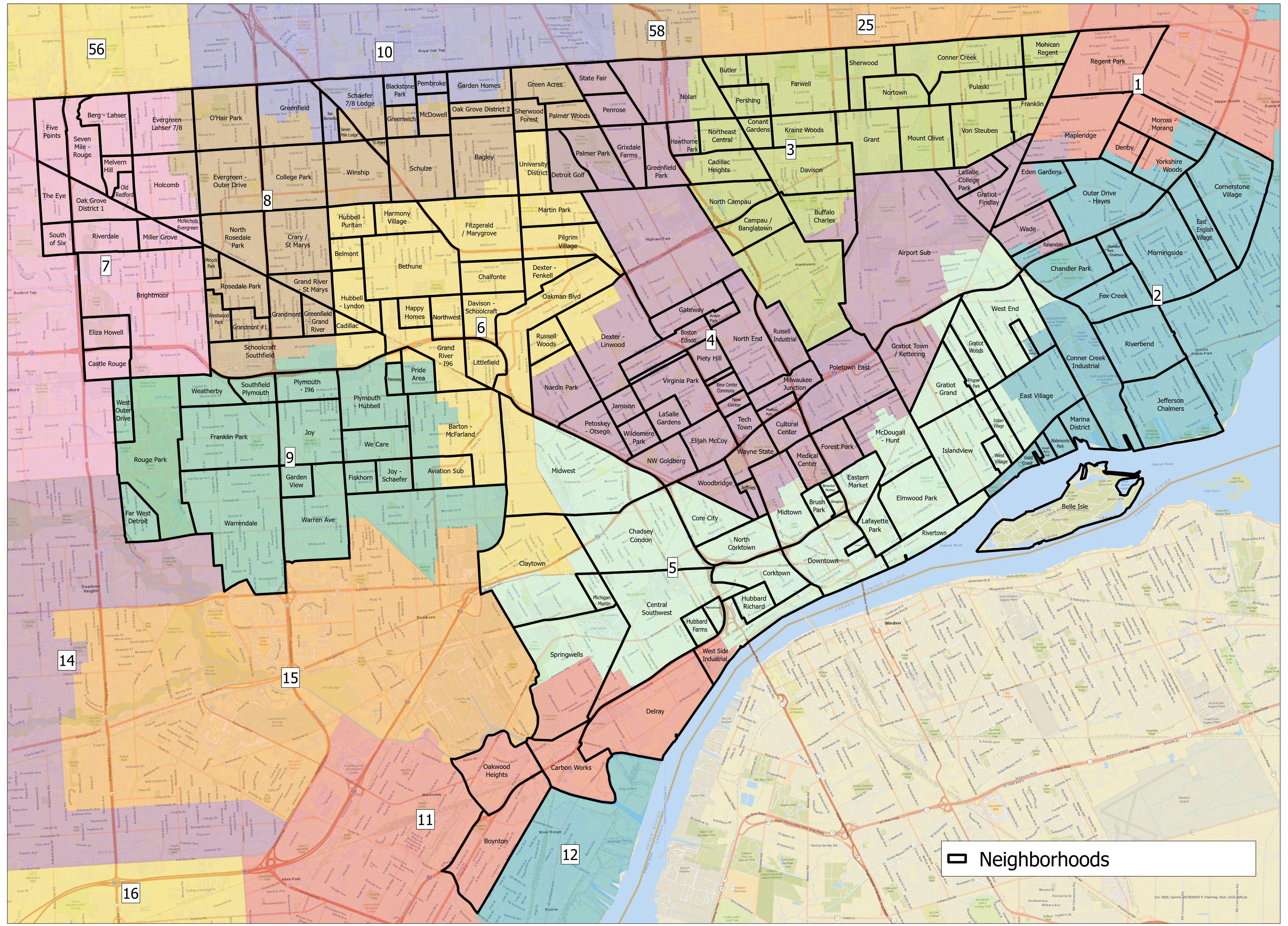


EXHIBIT B

EXHIBIT B



Michigan - Trende State House Plan - with City of Detroit Neighborhoods



Neighborhoods